

Exhibit 32 (updated)

Plaintiff's Attorneys' Fees as of August 13, 2024 Resulting from Defendant's Discovery Negligence

<u>Task</u>	<u>Amount of Time</u>	<u>Rate</u> <u>(\$650/hour)</u>
Drafted and sent emails to Defendant's counsel re Defendant's discovery negligence; reviewed and responded to Defendant's counsel's emails re the same; participated in various phone calls regarding same.	3.0*	
Drafted and served supplemental discovery requests in February 2023 necessitated by Defendant's negligence in responding to Plaintiff's July 2022 requests.	1.0	
Drafted motion for discovery extension and corresponding proposed order resulting from Defendant's discovery negligence and conferred with Defendant's counsel re same. <i>[Doc. 62, Doc. 62-1]</i>	1.0	
Prepared for and re-opened depositions of Defendant's 30(b)(6) representative, owner, and manager on May 2, 2023, following Defendant's April 20, 2023 production of 3,500 pages, including the hottest in the case. <i>[Deposition preparation included re-reviewing Defendant's earlier depositions, document production, and discovery responses, which materially conflicted with Defendant's late production and responses on key issues.]</i>	5.0*	
Drafted and sent communications to Court regarding discovery dispute. Drafted discovery dispute statement and conferred with opposing counsel regarding same before submitting final statement to Court. <i>[Docs. 70, 70-1, 70-2]</i>	3.0*	
Prepared for and participated in telephonic conference with Court re discovery dispute statement. <i>[Doc. 76]</i>	3.0	
Drafted and filed motion for sanctions and memorandum in support.	12.0 <i>[Exclusive of any time to be spent on reply brief]</i>	
Drafted and filed reply in support of motion for sanctions and memorandum in support.	6.0	
Prepared for and participated in August 6, 2024 hearing on motion for sanctions and memorandum in support.	3.5	
	37.5	\$24,375

* Plaintiff's counsel is litigating a related case against United Inn & Suites (*J.G. v. United Inn*, Case No. 1:20-cv-05233-SEG). That case involves a substantially similar discovery dispute, and Plaintiff J.G. has filed a motion for sanctions. To avoid recovering attorneys' fees for the same work multiple times, Plaintiff has identified certain tasks that applied to all three cases and divided by 1/3. In the absence of a *, Plaintiff's counsel divided by 1/2, to avoid recovering attorneys' fees for the same work in A.G.'s and G.W.'s respective cases. Even in the absence of a *, Plaintiff's counsel's time is discounted to reflect work performed in Plaintiff J.G.'s case

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that was re-used here. For example, Plaintiff's counsel spent far more than the 12 hours reflected above preparing the motion for sanctions in this case but split his time on the motion for sanctions between A.G.'s and G.W.'s cases (24 hours total), and, where possible, incorporated work and research performed for the J.G. motion for sanctions.

The total time only reflects hours worked because of Defendant's discovery negligence by the primary lawyer on the case, David Bouchard. Total time does not include associate time or administrative staff time.

Plaintiff's Expenses Resulting from Defendant's Discovery Negligence

Hired court reporter and videographer for re-opened depositions on May 2, 2023	N/A	\$1,025.16*
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*Total cost of transcripts (\$1,975.50) and videos (\$1,100.00) was \$3,075.50. To avoid recovering for the same expenses multiple times in the three related cases against United Inn, Plaintiff has divided the expenses by 1/3.